

# OSBORN LAW P.C.

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April 17, 2023

## **VIA ECF**

Honorable John P. Cronan  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Klein v. Commissioner of Social Security*  
Civil Action No. 1:23-cv-00272-JPC

Dear Judge Cronan,

We write on behalf of our client, Christian P. Klein, to request additional time to file his brief for requested relief which is currently due on April 19, 2023 per the Court's January 13, 2023 Standing Scheduling Order. This is the first request for an extension. The reason for the request is that our office has an unusually large backlog of briefs that are due in the next several weeks, including that of Mr. Klein.

After conferring with the defendant, the parties have agreed to proceed according to the following amended scheduling order, subject to the Court's approval:

- Plaintiff to file his brief for the requested relief on or before: **June 19, 2023.**
- Defendant to file its brief in response on or before: **September 4, 2023.**
- Plaintiff to file his reply, if any, on or before: **September 23, 2023.**

Thank you for your consideration of this request.

Respectfully submitted,

s/Daniel A. Osborn  
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cc: Heetano Shamsoundar, Esq. (by ECF)

The request is granted. Plaintiff shall file his brief by June 19, 2023. Defendant shall file its response by September 4, 2023. Plaintiff shall file his response, if any, by September 23, 2023. The Clerk of Court is respectfully directed to close the motion pending at Docket Number 8.

SO ORDERED.  
Date: April 18, 2023  
New York, New York



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JOHN P. CRONAN  
United States District Judge